Case 2:21-cr-00109-DAD Document 253 Filed 10/03/24 Page 1 of 2

1	PHILLIP A. TALBERT		
2	United States Attorney ROBERT C. ABENDROTH		
	EMILY G. SAUVAGEAU ANGELA L. SCOTT		
3	Assistant United States Attorneys		
4	501 I Street, Suite 10-100 Sacramento, CA 95814		
5	Telephone: (916) 554-2700 Facsimile: (916) 554-2900		
6			
7	Attorneys for Plaintiff United States of America		
8			
9	IN THE UNITED STATES DISTRICT COURT		
10	EASTERN DIS	TRICT OF CALIFORNIA	
11	UNITED STATES OF AMERICA,	CASE NO. 21-CR-00109-DAD-8	
12	, in the second		
13	Plaintiff,	STIPULATION TO SCHEDULE CHANGE-OF- PLEA HEARING	
14	V.	DATE: October 8, 2024	
15	JOSE GENARO VARGAS-RAMIREZ,	TIME: 9:30 a.m. COURT: Hon. Dale A. Drozd	
16	Defendant.	COOKI. Hom. Build H. Broza	
17	Plaintiff United States of America, by a	and through its counsel of record, and defendant JOSE	
18	GENARO VARGAS-RAMIREZ ("defendant"), by and through defendant's counsel of record, Dina	
19	Santos, hereby stipulate as follows:		
20	1. On June 23, 2021, defendant was an	raigned on the indictment in the above-captioned matter.	
21	At a hearing on July 2, 2021, defend	dant was ordered released on bond. Doc. 44, 68.	
22	2. By previous order, this case was set	for trial on November 4, 2024. The Court set a trial	
23	confirmation hearing for October 8,	2024. Doc. 208.	
24	3. The government previously extende	ed a written plea offer to defendant, and counsel for	
25	defendant indicated that defendant i	ntends to accept that offer. The government will file the	
26	agreement upon its receipt of the sig	gned copy from defense counsel.	
27	4. By this stipulation, the parties respe	ectfully request that the Court vacate the currently	
28	scheduled trial confirmation hearing	g and instead set a change-of-plea hearing for defendant	

Case 2:21-cr-00109-DAD Document 253 Filed 10/03/24 Page 2 of 2

1	on the same date, October 8, 2024, so	o that defendant may enter his guilty plea pursuant to the
2	parties' agreement.	
3		
4	IT IS SO STIPULATED	
5	Dated: October 2, 2024	PHILLIP A. TALBERT
6		United States Attorney
7		By: /s/ ANGELA L. SCOTT ANGELA L. SCOTT
8		ANGELA L. SCOTT Assistant United States Attorney
9		
10	Dated: October 2, 2024	/s/ DINA SANTOS per email authorization
11		DINA SANTOS
12		Counsel for Defendant JOSE GENARO VARGAS-
13		RAMIREZ
14		
15		ORDER
16		or good cause shown, IT IS HEREBY ORDERED that
17	Tarbaant to the parties supulation and it	51 good eduse shown, 11 is Tilliced 1 Ordered that
	the trial confirmation hearing currently set for O	october 8, 2024, is vacated as to defendant IOSE
18	the trial confirmation hearing currently set for O GENARO VARGAS-RAMIREZ ("defendant")	
18 19	GENARO VARGAS-RAMIREZ ("defendant")	october 8, 2024, is vacated as to defendant JOSE and a change-of-plea hearing for defendant is hereby set
	GENARO VARGAS-RAMIREZ ("defendant") for October 8, 2024, at 9:30 a.m.	
19	GENARO VARGAS-RAMIREZ ("defendant")	and a change-of-plea hearing for defendant is hereby set
19 20	GENARO VARGAS-RAMIREZ ("defendant") for October 8, 2024, at 9:30 a.m.	and a change-of-plea hearing for defendant is hereby set Dale A. Droyd
19 20 21	GENARO VARGAS-RAMIREZ ("defendant") for October 8, 2024, at 9:30 a.m. IT IS SO ORDERED.	and a change-of-plea hearing for defendant is hereby set
19 20 21 22	GENARO VARGAS-RAMIREZ ("defendant") for October 8, 2024, at 9:30 a.m. IT IS SO ORDERED.	and a change-of-plea hearing for defendant is hereby set Dale A. Droyd DALE A. DROZD
19 20 21 22 23	GENARO VARGAS-RAMIREZ ("defendant") for October 8, 2024, at 9:30 a.m. IT IS SO ORDERED.	and a change-of-plea hearing for defendant is hereby set Dale A. Droyd DALE A. DROZD
19 20 21 22 23 24	GENARO VARGAS-RAMIREZ ("defendant") for October 8, 2024, at 9:30 a.m. IT IS SO ORDERED.	and a change-of-plea hearing for defendant is hereby set Dale A. Droyd DALE A. DROZD

28